

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FELIPE THOMAS Y DE LA GANDARA a/k/a CASE NO.: 2:25-CV-02242-FB-JMV
FELIPE THOMAS Y DE LA GANDARA,
5TH MARQUES DE IVANREY.;

Plaintiff,

v.

MARCO ANTONIO SORIANO;

Defendants.

**SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFFS FIRST AMENDED COMPLAINT**

Defendant, Marco Antonio Soriano (“Defendant”), hereby file this Second Unopposed Motion for Extension of Time to Respond to Plaintiffs’ Felipe Thomas y De La Gandara a/k/a Felipe Thomas y De La Gandara, 5th Marques De Ivanrey (“Plaintiffs”) First Amended Complaint against Mr. Soriano **ECF No. 16**, and in support thereof state as follows:

1. On November 21, 2025, Plaintiffs filed their First Amended Complaint against Mr. Soriano **ECF No. 16** (the “Motion”).
2. Defendant’s response to the Amended Complaint was originally due on December 5, 2025.
3. Defendants were granted an extension to respond to the Amended Complaint on or before January 15, 2026.
4. The parties are engaged in ongoing settlement negotiations and have agreed to participate in an additional, short session with the mediator, if needed, to help facilitate resolution of this matter.



5. In light of these ongoing settlement efforts, Defendants respectfully request an additional thirty (30)-day extension, up to and including February 16, 2026, to respond to the Amended Complaint.

6. Opposing counsel consents to the requested extension.

7. This Motion is made in good faith and not for the purpose of delay.

8. No party will be prejudiced by the granting of the requested extension.

WHEREFORE, Defendant Marco Antonio Soriano respectfully requests that this Court grant this Unopposed Motion, extend the deadline to respond to the First Amended Complaint through February 16, 2026, and grant such other relief as the Court deems just and proper.

Dated: January 13, 2026.

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7.1(a)(3), the undersigned counsel hereby certifies that on January 13, 2026, counsel for Defendant conferred with counsel for Plaintiffs regarding the relief sought in this Motion. Plaintiffs' counsel does not object to the relief requested herein.

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Respectfully submitted,

BARAKAT + BOSSA, PLLC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 13, 2026, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. Copies of the foregoing document will be served on all counsel of records via transmission of Notice of Electronic Filing generated by CM/ECF.

By: /s/ Giacomo Bossa

GIACOMO BOSSA



BARAKAT
+ BOSSA